BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Mailing Online Service   )

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: DANIEL STIREWALT
(OCA/USPS-T3-46-49)
October 2, 1998

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits interrogatories and

requests for production of documents. Instructions included with OCA interrogatories

OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby

incorporated by reference.

Respectfully submitted,

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich
Acting Assistant Director

OCA/USPS-T3-46. Please provide the attachments to your response to OCA/USPS-T3-1 as Excel spreadsheets.

OCA/USPS-T3-47. Please refer to the column "YR 1999 Estimate," section "PROCESSING CENTER—DATA STORAGE, Financial Transactions" at Tr. 3/722.

a.   Please confirm that the number, 230.04, is expressed in units of "sessions/business day." If you do not confirm, please show the derivation of the correct units. Please explain why this same number is variously identified as "Customer sessions per business day" at Tr. 3/720, "Total Transactions Per Day" at Tr. 3/722, and "Total Documents Per Day" at Tr. 3/722.

b.   Please confirm that the number, 1,150, is expressed in units of "sessions/week." If you do not confirm, please show the derivation of the correct units. Please confirm that the formula for computing this number is (230.04 sessions/business day) * (5 business days/week). If you do not confirm, please provide the correct formula. Please confirm that when originally calculating the number 230.04 you assumed that there are 6 business days per week ("6 day work week assumed," Tr. 3/720). If you do not confirm, please explain. Please reconcile the 6-day week used at page 720 with the 5-day week used at page 722.

c.   Please confirm that the number, 59,810, is expressed in units of "sessions/year." If you do not confirm, please show the derivation of the correct units. Please confirm that in computing this number, you have assumed 260 business days per year. If you do not confirm, please explain. Please confirm that when originally calculating the number 230.04 you assumed that there are 312

business days per year ("Calculated (sessions per year / 312 business days in a year, . . .)" Tr. 3/720). Please confirm that "sessions/year" can be calculated directly from page 720 as (5981 users) * (12 sessions/user/year) = 71,772 sessions/year. See Tr. 4/858. If you do not confirm, please explain.

d.   Please confirm that the number, 221, is expressed in units of "bytes/session." If you do not confirm, please show the derivation of the correct units. The number, 221, is sourced to "Attachment 5: Sources." Please provide a copy of or citation to "Attachment 5: Sources."

e.   Please confirm that the number, 1, is expressed in units of "days." If you do not confirm, please show the derivation of the correct units.

f.   Please confirm that the number, 180, is expressed in units of "days." If you do not confirm, please show the derivation of the correct units. Please confirm that during the first half of 1999, there will not be 180 days' worth of accumulated data requiring backup storage. If you do not confirm, please explain.

g.   Please confirm that the number, 1460, is expressed in units of "days." If you do not confirm, please show the derivation of the correct units. Please confirm that there will be fewer than 1460 days in 1999. Please confirm that this number should be 365—i.e., there is no carryover of data from prior years into 1999. Please confirm that for 2000, 2001, 2002, and 2003, this number should be 731, 1096, 1460, and 1460, respectively. If you do not confirm, please explain.

h.   Please confirm that the number, 7625.78, is expressed in units of "bytes." If you do not confirm, please show the derivation of the correct units. Please confirm that this daily on-line storage requirement will actually vary widely in 1999

depending on the actual number of daily customer sessions. If you do not confirm, please explain.

i.   Please confirm that the number, 1,372,639.50, is expressed in units of "bytes." If you do not confirm, please show the derivation of the correct units. Please confirm that this backup storage requirement will not be needed until six months into 1999. If you do not confirm, please explain.

j.   Please confirm that the number, 11,133,631.50, is expressed in units of "bytes." If you do not confirm, please show the derivation of the correct units. Please confirm that the maximum archive storage requirement for 1999 is actually one-fourth of this (or 2,783,407.88 bytes), and that this amount of storage will not be needed until the last day of 1999. If you do not confirm, please explain.

OCA/USPS-T3-48. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 8 and 9, in the column "YR 1999 Estimate."

a.   Please confirm that the figure, 5,196,568.85, is expressed in units of "(bytes/page (PDF)) * sessions." Please confirm that the correct units should be "bytes (PDF)." If you do not confirm, please show the derivation of the proper units.

b.   Please confirm that the formula used to calculate the figure 5,196,568.85 should contain the multiplicative terms 3.2 pages per piece, 4,120 pieces per session, and 0.5 mail merge factor yielding 34,251,653,077 "bytes (PDF)." If you do not confirm, please explain.

c.   Please confirm that the figure, 15,589,706.54, is expressed in units of "(bytes/page (PDF)) * sessions." Please confirm that the correct units should be "bytes (PDF)." If you do not confirm, please show the derivation of the proper units.

d.   Please confirm that the formula used to calculate the figure 15,589,706.54 should contain the multiplicative terms 3.2 pages per piece, 4,120 pieces per session, and 0.5 mail merge factor yielding 102,754,959,230.77 "bytes (PDF)." If you do not confirm, please explain.

e.   Please confirm that the figure, 20,786,275.38, is expressed in units of "(bytes/page (PDF)) * sessions." Please confirm that the correct units should be "bytes (PDF)." If you do not confirm, please show the derivation of the proper units.

f.   Please confirm that the formula used to calculate the figure 20,786,275.38 should contain the multiplicative terms 3.2 pages per piece, 4,120 pieces per session, and 0.5 mail merge factor yielding 137,006,612,307.69 "bytes (PDF)." If you do not confirm, please explain.

OCA/USPS-T3-49. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 9, in the column "YR 1999 Estimate."

a.   Please confirm that the figure, 126,551,145, is expressed in units of "bytes/page (Postscript) * pieces/session." Please confirm that the correct units should be "bytes (Postscript)/session." If you do not confirm, please show the derivation of the proper units.

b.   Please confirm that the formula used to calculate the figure 126,551,145 should contain the multiplicative term 3.2 pages per piece yielding 404,963,664.9 "bytes (Postscript)/session." If you do not confirm, please explain.

c.   Please confirm that the figure, 65,501,169,231, is expressed in units of "((bytes/page (Postscript)) * pieces." Please confirm that the correct units should be "bytes (Postscript)." If you do not confirm, please show the derivation of the proper units.

d.   Please confirm that the formula used to calculate the figure 65,501,169,231 should contain the multiplicative term 3.2 pages per piece yielding 2.09604E+11 "bytes (Postscript)." If you do not confirm, please explain.

e.   Please confirm that the figure, 1.96504E+11, is expressed in units of "((bytes/page (Postscript)) * pieces." Please confirm that the correct units should be "bytes (Postscript)." If you do not confirm, please show the derivation of the proper units.

f.   Please confirm that the formula used to calculate the figure 1.96504E+11 should contain the multiplicative term 3.2 pages per piece yielding 6.28811E+11 "bytes (Postscript)." If you do not confirm, please explain.

g.   Please confirm that the figure, 2.62005E+11, is expressed in units of "((bytes/page (Postscript)) * pieces." Please confirm that the correct units should be "bytes (Postscript)." If you do not confirm, please show the derivation of the proper units.

h.   Please confirm that the formula used to calculate the figure 2.62005E+11 should

contain the multiplicative term 3.2 pages per piece yielding 8.38415E+11 "bytes

(Postscript)." If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all

participants of record in this proceeding in accordance with section 12 of the rules of

practice.

Emmett Rand Costich

Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
October 2, 1998